

## **More than 100 National Security and Foreign Policy Experts Call on Congress to Tackle Anonymous Shell Companies**

The Honorable Mike Crapo  
Chairman, Committee on Banking, Housing, and Urban Affairs  
United States Senate  
534 Dirksen Senate Office Building  
Washington, D.C. 20510

The Honorable Sherrod Brown  
Ranking Member, Committee on Banking, Housing, and Urban Affairs  
United States Senate  
534 Dirksen Senate Office Building  
Washington, D.C. 20510

November 13, 2019

Dear Chairman Crapo and Ranking Member Brown,

We write as former military officers, administration officials, law enforcement agents, and foreign policy experts to affirm our conviction that illicit finance poses a serious threat to U.S. national security. As you work to safeguard the U.S. financial system from abuse, we urge you to act against crime and corruption facilitated by anonymous ownership of U.S. shell companies.

The ability to control U.S. companies without disclosing beneficial ownership information has made them attractive vehicles for money laundering. Rogue regimes, terrorist groups, transnational criminal organizations, arms dealers, kleptocrats, drug cartels, and human traffickers have all used U.S.-registered shell companies to obscure their identities and facilitate illicit activities. Meanwhile, U.S. intelligence and law enforcement agencies often find it difficult to investigate these illicit financial networks without access to information about the beneficial ownership of corporate entities involved.

Adversarial authoritarian regimes have become adept at exploiting financial secrecy to spread malign economic influence globally and undermine American leadership. As General David Petraeus and Senator Sheldon Whitehouse noted recently, “the fight against corruption is more than a legal and moral issue; it has become a strategic one — and a battleground in a great power competition.”<sup>1</sup> It is alarming, therefore, that a World Bank study found that U.S. shell companies were used in more grand corruption cases than those of any other country.<sup>2</sup>

The global spread of crime and corruption, often facilitated by anonymous shell companies, has undermined democratization and economic development in many countries, with adverse implications for U.S. and global security. Societies impoverished by kleptocratic rulers breed

---

<sup>1</sup> David Petraeus and Sheldon Whitehouse, “Putin and Other Authoritarians’ Corruption is a Weapon — and a Weakness,” *Washington Post*, March 8 2019.

<sup>2</sup> Emily Halter, Robert Harrison, Ji Won Park, Jason Sharman, Emile Van Der Does De Willebois, *The Puppet Masters : How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It* (Stolen Asset Recovery Initiative / World Bank, 2011)

## **More Than 100 National Security and Foreign Policy Experts Call on Congress to Tackle Anonymous Shell Companies**

resentment and instability, providing fertile recruiting ground for terrorist groups—many of whom use anonymous shell companies in their own illicit funding networks. Corporate anonymity can also pose a direct threat to U.S. military operations and troop safety, for example when the Department of Defense spent \$3.3 million on a U.S.-Afghan contractor secretly owned by local powerbrokers who also purchased weapons for the Taliban.<sup>3</sup>

Anonymous shell companies are routinely used to circumvent U.S. sanctions relating to Iran, North Korea, Russia, Venezuela, and elsewhere. Indeed, Iranian entities relied on U.S. shell companies to maintain ownership of a skyscraper on New York’s Fifth Avenue, which they leased out to Americans for two decades before being detected.<sup>4</sup>

Despite these and numerous other alarming examples, research from the University of Texas and Brigham Young University shows that the U.S. remains one of the easiest places in the world to set up an anonymous shell company.<sup>5</sup> A recent report by Global Financial Integrity demonstrates that, in all 50 U.S. states, more information is currently required to obtain a library card than to register a company.<sup>6</sup>

As the global economy becomes more interconnected and technologically advanced, America’s adversaries will turn to innovative methods of laundering the proceeds of crime and spreading malign economic influence. We must ensure that U.S. intelligence and law enforcement agencies possess the resources they need to hunt bad actors through an increasingly complex global financial system, including corporate beneficial ownership information.

By ending anonymous ownership of companies and encouraging other countries to do the same, the United States could turn a vulnerability into an advantage, disrupting illicit financial networks and pushing back against adversaries who seek to undermine the rule of law globally. Many of our democratic allies, including the European Union, have recognized this and mandated the collection of corporate beneficial ownership information to strengthen their own anti-money laundering systems.

We thank you and your Congressional colleagues for your continued leadership and urge you to adopt legislation that would require the collection of information about the beneficial ownership of U.S. companies.

Sincerely,

---

<sup>3</sup> “Secret Company Owners Defrauding U.S. Taxpayers, Putting Troops at Risk and Providing Support to Terrorists, Report Reveals,” Global Witness, July 12 2016.

<sup>4</sup> Vivian Wang, “Manhattan Skyscraper Linked to Iran Can Be Seized by U.S., Jury Finds,” *New York Times*, June 29 2017.

<sup>5</sup> Michael Findley, Daniel Nielson and Jason Sharman, *Global Shell Games: Experiments in Transnational Relations, Crime, and Terrorism* (Cambridge University Press, 2014).

<sup>6</sup> “The Library Card Project: The Ease of Forming Anonymous Companies in the United States,” Global Financial Integrity, March 21 2019.

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

JOHN AGOGLIA, Col. (Ret.), USA

Former Director of the Counterinsurgency Training Center in Afghanistan

NATALIA ARNO

President, Free Russia Foundation

MONICA ARRUDA DE ALMEIDA

Adjunct Professor, Center for Latin American Studies, Edmund A. Walsh School of Foreign Service, Georgetown University

DAVID L. ASHER, PhD

Former Coordinator, North Korea Working Group, Office of the Secretary of State, U.S.

Department of State

Former Senior Advisor for East Asian and Pacific Affairs, Office of the Secretary of State, U.S.

Department of State

Senior Fellow, Foundation for Defense of Democracies

ANDERS ÅSLUND, PhD

Resident Senior Fellow, Eurasia Center, Atlantic Council

THOMAS P. BALTAZAR, Col. (Ret.), USA

Former Director, Office of Military Affairs, U.S. Agency for International Development

DONNA BARBISCH, Major General (Ret.), USA

ANDREA BARTOLI

Dean of the School of Diplomacy and International Relations, Seton Hall University

RICK BARTON, Amb. (ret.)

Former Assistant Secretary of State, U.S. Department of State

Former Deputy High Commissioner for Refugees, United Nations

Author of *Peace Works* and Lecturer at Princeton University

WILLIAM E. BERRY, JR., Col. (Ret.), USAF

ROB BERSCHINSKI

Former Deputy Assistant Secretary of State for Democracy, Human Rights and Labor, U.S.

Department of State

Former Director for Security and Human Rights, National Security Council, The White House

ALINA BLOOM

Former Special Agent, Federal Bureau of Investigation, U.S. Department of Justice

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

**MICHAEL BOSSHART**

Former Foreign Service Officer, U.S. Department of State

**REBECCA BROCATO**

Former Special Assistant to the President, The White House  
Former Senior Advisor for Legislative Affairs, U.S. Department of State  
Director of Strategy and Government Affairs, National Security Action

**BRAD BROOKS-RUBIN**

Former Special Advisor for Conflict Diamonds, U.S. Department of State  
Managing Director, The Sentry/Enough Project

**JOHN J. BYRNE, CAMS, Esq.**

Former Executive Vice President, Association of Certified Anti-Money Laundering Specialists  
Adjunct Professor, Schar School of Policy and Government, George Mason University

**CHARLES T. CALL, PhD**

Former Senior Adviser to the Assistant Secretary for Conflict and Stabilization Operations, U.S. Department of State  
Associate Professor, American University

**GREG E. CALLES**

Former Supervisory Senior Resident Agent, Federal Bureau of Investigation

**SCOTT CARLSON**

Former Senior Rule of Law Advisor, U.S. Department of State

**MICHAEL CARPENTER, PhD**

Former Deputy Assistant Secretary of Defense for Russia, Ukraine, and Eurasia, U.S. Department of Defense  
Senior Director, Biden Center for Diplomacy and Global Engagement, University of Pennsylvania

**JOHN A. CASSARA**

Former Special Agent, U.S. Department of the Treasury

**SARAH CHAYES**

Former Special Assistant to the Chairman of the Joint Chiefs of Staff, U.S. Department of Defense  
Former Special Advisor to Generals David McKiernan and Stanley McChrystal, International Security Assistance Force (Afghanistan)  
Author, *Thieves of State: Why Corruption Threatens Global Security*

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

BETH COLE

Former Director, Office of Civil-Military Cooperation, U.S. Agency for International Development

CHRISTOPHER CORPORA, PhD

Former U.S. National Security Officer  
Professor of Practice, Mercyhurst University

THOMAS CREAL, CPA

Former UN Panel Expert for Sanctions  
Former Lead Expert for Task Force 2010 in Afghanistan

ARTHUR E. DEWEY

Former Assistant Secretary of State for Population, Refugees, and Migration, U.S. Department of State

LARRY DIAMOND, PhD

Senior Fellow, Freeman Spogli Institute for International Studies, Stanford University  
Senior Fellow, Hoover Institution

MICHAEL DZIEDZIC, PhD, Col. (Ret.), USAF

Adjunct Professor, George Mason University

CAMILLE EISS

Former Senior Advisor for Anti-Corruption to the Assistant Secretary for Democracy, Rights and Labor, U.S. Department of State  
Chief of Policy and Global Partnerships, Organized Crime and Corruption Reporting Project

ISRAEL D. ESCABI

Former Unit Chief, Federal Bureau of Investigation

KAREN J. FINKENBINDER, PhD

Rule of Law, Justice & Reconciliation Advisor, Peacekeeping & Stability Operations Institute, U.S. Army War College

JAMIE FLY

Former Counselor for Foreign and National Security Affairs to Senator Marco Rubio  
Former Executive Director, Foreign Policy Initiative  
Former Director for Counterproliferation Strategy, National Security Council, The White House  
Former Assistant for Transnational Threats Policy, Office of the Secretary of Defense, U.S. Department of Defense  
Senior Fellow and Director, Future of Geopolitics Program; Director, Asia Program, German Marshall Fund of the United States

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

CLAY R. FULLER Ph.D.

Adjunct Professor Western Carolina University

Former Jeane Kirkpatrick Fellow, American Enterprise Institute (AEI)

GAIL FULLER

Former Analyst, Office of Illicit Finance, U.S. Department of the Treasury.

JACK H. GAINES

Former Joint Strategic Advisor, U.S. Department of Defense

Chairman, Chronemics

MARY BETH GOODMAN

Former Special Assistant to the President for National Security Affairs and Senior Director for Development, Democracy and Humanitarian Affairs, National Security Council, The White House

Former Director for International Economic Affairs, National Security Council, The White House

KAREN A. GREENAWAY, Esq.

Former Special Agent, Federal Bureau of Investigation, U.S. Department of Justice

MORTON H. HALPERIN

Former Director of Policy Planning, U.S. Department of State

LEONARD R. HAWLEY

Former Deputy Assistant Secretary of State for International Organization Affairs, U.S. Department of State

Former Director for Multilateral Affairs, National Security Council, The White House

Former Policy Team Staff, National 9/11 Commission

CHRISTOPHER HOH

Former Deputy Chief of Mission at the American Embassy in Vienna and Sarajevo

Former Director for South Central European Affairs, U.S. Department of State

Former Director for Response Strategy and Resource Management, Office for Reconstruction and Stabilization, U.S. Department of State

CARYN HOLLIS

Former acting Assistant Secretary of Defense for Special Operations/Low-intensity Conflict, U.S. Department of Defense

Former Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats, U.S. Department of Defense

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

CHRISTOPHER J. HOLSHEK, Col. (Ret.), USA  
Senior Fellow, Alliance for Peacebuilding  
Senior Civil-Military Advisor, Narrative Strategies

MELISSA HOOPER  
Director, Human Rights and Civil Society program, Human Rights First

BARBARA KELLER  
Former Deputy Associate Director of Compliance and Enforcement, Financial Crimes  
Enforcement Network, U.S. Department of the Treasury

BENJAMIN JUDAH  
Research Fellow, Kleptocracy Initiative, Hudson Institute

EDWARD P. JOSEPH  
Adjunct Professor & Senior Fellow, Johns Hopkins School of Advanced International Studies

JOSHUA KIRSCHENBAUM  
Former Acting Director, Office of Special Measures, Financial Crimes Enforcement Network,  
U.S. Department of the Treasury  
Senior Fellow, Alliance for Securing Democracy, German Marshall Fund

JACQUES PAUL KLEIN, Major General (Ret.), USAF  
Former Under-Secretary-General of the United Nations

DAVID J. KRAMER  
Former Assistant Secretary of State for Democracy, Human Rights and Labor, U.S. Department  
of State  
Former Deputy Assistant Secretary of State for Europe and Eurasia, U.S. Department of State

MARK A KROEKER  
Former Assistant Secretary General ad interim, United Nations  
Former United Nations Police Commissioner  
Former Portland Oregon Police Chief  
Former Los Angeles Police Deputy Chief

DEBRA LAPREVOTTE  
Former Supervisory Special Agent, International Corruption Unit, Federal Bureau of  
Investigation, U.S. Department of Justice  
Senior Investigator, The Sentry

EDWARD LEMON, PhD  
DMGS-Kennan Institute Fellow, Daniel Morgan Graduate School, Wilson Center

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

ALFONSO E. LENHARDT, Amb. (Ret.), Major General (Ret.), USA  
Former Deputy Administrator, U.S. Agency for International Development  
Former U.S. Ambassador to Tanzania  
Former Sergeant at Arms, U.S. Senate  
Former Commanding General, U.S. Army Recruiting Command

DENNIS LORMEL  
Former Chief, Terrorist Financing Operations Section, Counterterrorism Division, Federal Bureau of Investigation, U.S. Department of Justice

DAVID M. LUNA  
Former Senior Director for National Security & Diplomacy, U.S. Department of State  
Former Director for Transnational Threats and Illicit Networks (Anti-Crime Programs), U.S. Department of State  
Former Director for Anti-Corruption and Governance Initiatives, Bureau of International Narcotics and Law Enforcement Affairs, U.S. Department of State

JEFFREY W. MADISON  
Former Agent, Federal Bureau of Investigation

MAX G. MANWARING, Col. (Ret.), USA  
Professor of Military Strategy, Strategic Studies Institute, U.S. Army War College

J.R. MCBRIEN  
Former Associate Director for Global Targeting, Office of Foreign Assets Control, Department of the Treasury

MICHAEL MCFAUL, Amb. (Ret.), PhD  
Former U.S. Ambassador to the Russian Federation  
Former Special Assistant to the President and Senior Director of Russian and Eurasian Affairs, National Security Council, The White House  
Professor of Political Science, Director and Senior Fellow, Freeman Spogli Institute for International Studies, Stanford University  
Senior Fellow, Hoover Institution

THOMAS O. MELIA  
Former Assistant Administrator for Europe & Eurasia, U.S. Agency for International Development  
Former Deputy Assistant Secretary of State for Democracy, Human Rights, and Labor, U.S. Department of State  
Washington Director, PEN America

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*



**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

CHRISTOPHER MOELLER

Former Investigator, Asset Forfeiture and Money Laundering Section, Criminal Division , U.S. Department of Justice

DAVID MURRAY

Former Director, Office of Illicit Finance, U.S. Department of the Treasury  
Former Senior Advisor to the Under Secretary, U.S. Department of the Treasury

MATTHEW H. MURRAY

Former Deputy Assistant Secretary of Commerce for Europe, the Middle East and Africa, U.S. Department of Commerce

Former Deputy Assistant Secretary of Commerce for Europe and Eurasia, U.S. Department of Commerce

ANDREW NATSIOS

Former Administrator, U.S. Agency for International Development  
Executive Professor at the Bush School, Texas A&M University  
Director of the Scowcroft Institute of International Affairs

BRIAN O'TOOLE

Former Senior Adviser to the Director, Office of Foreign Assets Control, U.S. Department of the Treasury  
Nonresident Senior Fellow, Global Business and Economics Program, Atlantic Council

OLGA OLIKER

Europe Program Director, International Crisis Group

JAMES W. PARDEW Amb. (Ret.)

Former Deputy Assistant Secretary General of NATO for Operation and Crisis Management  
Former U.S. Ambassador to Bulgaria  
Former Deputy Special Adviser to the President and Secretary of State for Democracy in the Balkans

STEWART PATRICK

Senior Fellow, Council on Foreign Relations

GRETCHEN PETERS

Executive Director, The Center on Illicit Networks and Transnational Organized Crime  
Author, *Seeds of Terror: How Drugs, Thugs and Crime are Reshaping the Afghan War*

CHIP PONCY

Former Director, Office of Strategic Policy for Terrorist Financing and Financial Crimes, U.S. Department of the Treasury

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

Senior Advisor, Center on Sanctions and Illicit Finance, Foundation for Defense of Democracies

**ERIC G. POSTEL**

Former Associate Administrator, U.S. Agency for International Development  
Former Assistant to the Administrator for Africa, U.S. Agency for International Development  
Former Assistant Administrator, E3 Bureau, U.S. Agency for International Development

**JOHN PRENDERGAST**

Former Director for African Affairs, National Security Council, The White House  
Co-founder, The Sentry

**NED PRICE**

Former Special Assistant to the President, The White House  
Former Spokesperson, National Security Council, The White House  
Former Senior Analyst, Central Intelligence Agency  
Director of Policy and Communications, National Security Action

**SERGIO RODRIGUERA, Jr.**

Former Special Advisor to the Under Secretary for Terrorism and Financial Intelligence, U.S. Department of the Treasury  
Former Defense Fellow, U.S. Department of Defense  
Former Executive Officer, Afghanistan Threat Finance Cell

**ELIZABETH ROSENBERG**

Former Senior Advisor to the Assistant Secretary for Terrorist Financing and Financial Crimes, and then to the Under Secretary for Terrorism and Financial Intelligence, U.S. Department of the Treasury  
Senior Fellow and Director of the Energy, Economics, and Security Program, Center for a New American Security

**LAURA ROSENBERGER**

Former Chief of Staff to Deputy Secretary of State, U.S. Department of State  
Former Senior Advisor to Deputy National Security Advisor, National Security Council, The White House  
Former Director for China and Korea, National Security Council, The White House  
Director of the Alliance for Securing Democracy and Senior Fellow at the German Marshall Fund of the United States

**TOMMY ROSS**

Former Deputy Assistant Secretary of Defense for Security Cooperation, U.S. Department of Defense  
Senior Associate, Center for Strategic and International Studies

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

**JOSH RUDOLPH**

Former Director for International Economics, National Security Council, The White House  
Former Deputy Director, Markets Room, U.S. Department of the Treasury  
Former Advisor to the U.S. Executive Director, International Monetary Fund  
Senior Fellow, Alliance for Securing Democracy, German Marshall Fund

**ROBERT SAALE**

Former Director, Hostage Recovery Fusion Cell, Federal Bureau of Investigation, U.S.  
Department of Justice

**DONALD L. "LARRY" SAMPLER, JR.**

Former Assistant Administrator, U.S. Agency for International Development  
Vice President for Administration & Finance/COO, Metropolitan State University, Denver

**MARC SCHNEIDER**

Former Assistant Administrator for Latin America, U.S. Agency for International Development  
Former Principal Deputy Assistant Secretary of State for Human Rights, U.S. Department of  
State  
Former Senior Vice-president, International Crisis Group

**DONALD SEMESKY**

Former Chief of Financial Operations, Drug Enforcement Administration, U.S. Department of  
Justice  
Former Anti-Money-Laundering Policy Adviser and IRS-Criminal Investigation (IRS-CI)  
Liaison Officer, Office of National Drug Control Policy, The White House

**DANIEL SERWER**

Professor, Johns Hopkins School of Advanced International Studies

**LOUISE SHELLEY, PhD**

Omer L. and Nancy Hirst Endowed Chair, George Mason University  
Director, Terrorism, Transnational Crime and Corruption Center, George Mason University  
University Professor, Schar School of Policy and Government, George Mason University

**NATE SIBLEY**

Research Fellow, Kleptocracy Initiative, Hudson Institute

**BARBARA SMITH**

Former Deputy Assistant Administrator for Policy, Planning and Learning, U.S. Agency for  
International Development  
Former Director for Afghanistan and Pakistan, National Security Council, The White House  
Senior Associate (Non-resident), Center for Strategic and International Studies  
Adjunct Professor, Korbel School of International Studies

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

GAYLE E. SMITH

Former Administrator, U.S. Agency for International Development  
Former Senior Director for Development and Democracy, National Security Council, The White House  
President and CEO, The ONE Campaign

TYLER STAPLETON

Former Senior Legislative Assistant for National Security, U.S. House of Representatives  
Deputy Director of Congressional Relations, Foundation for Defense of Democracies

STEPHEN JOHN STEDMAN

Senior Fellow, Freeman Spogli Institute for International Studies, Stanford University

THOMAS STRENTZ, PhD

Former Supervisory Special Agent, Federal Bureau of Investigation, U.S. Department of Justice

ADAM SZUBIN

Former Acting Secretary of the Treasury, U.S. Department of the Treasury  
Former acting Under Secretary, Office of Terrorism and Financial Intelligence, Department of the Treasury

CHARLES E. TUCKER, Major General (Ret.), USAF

Former Director of Doctrine, Training, and Force Development (J-7) for the U.S. National Guard, Washington D.C.  
Executive Director of the World Engagement Institute, Chicago, IL

ROBERT ULMER

Former Special Agent, Federal Bureau of Investigation, U.S. Department of Justice

ROBERT W. VERICKER

Former Agent, Federal Bureau of Investigation  
Associate Professor, Administration of Justice Department, University of Hawaii

JODI VITTORI, Lt Col. (Ret.), USAF

Former ISAF Task Force Shafafiyat Contracting, Economic Development, and Rule of Law Team Chief

WILLIAM F. WECHSLER

Former Deputy Assistant Secretary of Defense for Special Operations and Combating Terrorism, U.S. Department of Defense  
Former Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats, U.S. Department of Defense

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*

**More Than 100 National Security and Foreign Policy Experts  
Call on Congress to Tackle Anonymous Shell Companies**

LAURA WILLIAMS

Former Supervisory Special Agent, Financial Crimes Section, Federal Bureau of Investigation

CLINT WILLIAMSON

Former Ambassador-at-Large for War Crimes Issues, Department of State

Former Special Assistant to the President, The White House

Former Senior Director for Relief, Stabilization and Development, National Security Council,  
The White House

Senior Director for Rule of Law, Governance and Security, McCain Institute

JONATHAN WINER

Former Deputy Assistant Secretary of State for International Law Enforcement, U.S. Department  
of State

BEVERLY S. WRIGHT

Former Supervisory Special Agent, Federal Bureau of Investigation, U.S. Department of Justice

JAMES M. WRIGHT

Former Senior Advisor, Office of Technical Assistance, U.S. Department of the Treasury  
Board Member, U.S. Capital Chapter, Association of Certified Anti-money Laundering  
Specialists

CC:

The Honorable Mike Pompeo, Secretary of State

The Honorable Steve Mnuchin, Secretary of the Treasury

The Honorable Mark Esper, Secretary of Defense

The Honorable William Barr, Attorney General

The Honorable Wilbur Ross, Secretary of Commerce

The Honorable Kevin McAleenan, Acting Secretary of Homeland Security

The Honorable Robert O'Brien, Assistant to the President for National Security Affairs

The Honorable Mark Green, Administrator, U.S. Agency for International Development

*This letter is signed in an individual capacity with institutional affiliations listed for reference only.*